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May 12, 2021

Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation, Acconeer AB
ET Docket No. 21-48

Dear Ms. Dortch:

On May 10, 2021, the undersigned held a telephonic meeting with Ethan Lucarelli, Acting Legal Advisor to Acting Chairwoman Rosenworcel, regarding the above-captioned matter. The parties discussed Acconeer's pending request for waiver and a future Notice of Proposed Rulemaking addressing broader issues regarding 60 GHz radar sensors.

Acconeer emphasized the need for quick agency action on its pending waiver request so that the life-saving benefits of its sensors, such as child seat reminders, may be provided to the American public. In particular, several major automotive manufacturers plan to use the Acconeer sensor in their product lines and require regulatory certainty. Any decision to issue waivers to other parties but not to Acconeer would be an abuse of agency discretion, as it would result in discriminatory treatment of similarly situated parties seeking the exact same relief.[1] Acconeer should be provided with the same relief as the other parties so to promote fair competition in the marketplace.

The parties further discussed concerns of the Wi-Gig community. The ETSI standard and standards being developed in other countries provide for more liberal operations of 60 GHz radar sensors than the FCC wavier grants.[2] Wi-Gig developers will need to determine how to co-exist with 60 GHz radar on a worldwide basis, and the FCC should be mindful of this when determining co-existence regime between these two unlicensed user groups in any rulemaking proceeding.

Sincerely,

/s/ Laura A. Stefani
Laura A. Stefani
Counsel to Acconeer AB

[1] *See e.g.*, *Green Country Mobilephone, Inc. vs. FCC*, 765 F.2d 235 (D.C. Cir. 1985).
[2] *See Vayyar Imaging Ltd. Request for Waiver of Section 15.255(c)(3) for Radars used for Interactive Motion Sensing in 57-64 GHz*, ET Docket No. 20-51, *et al.*, Order, DA 21-407 (rel. April 14, 2021).